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OUR REF: 503-99/EEL/PJG

September 1, 2006

¹ ALSO ADMITTED IN CONNECTICUT ASSO ADMITTED IN WASHINGTON D.C. ² ALSO ADMITTED IN LOUISIANA ³ ALSO ADMITTED IN MASSACHUSETTS

ALSO ADMITTED IN NEW JERSEY

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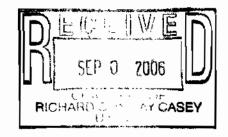
ERIC E LENCK

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MEMO ENDORSED

By Hand

The Hon. Richard C. Casey United States District Judge Southern District of New York Daniel P. Moynihan US Courthouse 500 Pearl Street, Room 1350 New York, NY 10007



Re: Maersk, Inc., et al. v. Neewra Inc., et al. 05 CIV 4356 (RCC)

Dear Judge Casey:

We represent the Maersk plaintiffs and write to request additional time to serve the Kuwaiti defendants (other than Mohinder Singh Sahni, who has been served via counsel). We have learned from Kuwaiti counsel that the only means of serving defendants in Kuwait is to first obtain a court-approved translation of the documents into Arabic (it is irrelevant that the parties to be served are fluent in English), and to next effect personal service by hand via a court-appointed process server. This process takes considerable time, and although we have done what we could to initiate the procedure in Kuwait within the time limits set by the Court, we anticipate that effectuating that service will take some time.

Accordingly, we request an extension of time to serve the Kuwaiti defendants and we respectfully propose that we advise the Court as to the status of service of process on the Kuwaiti defendants within the next 120 days. This is our first request for this relief.

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We thank the Court for its consideration of our request.

Respectfully submitted,

FREEHILL HOGAN & MÁHAR LLP

/Kahn Lawrence J.

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By fax: 212-732-3232

Application granted. So ordered.

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September 22, 2006